

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

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|-----------------------|---|--------------------------|
| DEANDRE BROWN, | § | |
| | § | |
| <i>Plaintiff,</i> | § | |
| | § | |
| vs. | § | Case No. 5:21-cv-00855-F |
| | § | |
| HEALTHCARE REVENUE | § | |
| RECOVERY GROUP, LLC., | § | |
| d/b/a ARS ACCOUNT | § | |
| RESOLUTION SERVICES., | § | |
| | § | |
| <i>Defendant.</i> | § | |

**DEFENDANT'S DISCLOSURE STATEMENT IDENTIFYING
CONSTITUENTS OF LLC OR PARTNERSHIP**

Defendant, Healthcare Revenue Recovery Group, LLC d/b/a ARS Account Resolution Services, by and through its undersigned counsel, files this Disclosure Statement Identifying Constituents of LLC or Partnership pursuant to LCvR7.1.1, and would respectfully show as follows:

1. Plaintiff has not invoked federal jurisdiction in this case on the basis of diversity of citizenship with an LLC or partnership. Instead, Plaintiff has invoked federal jurisdiction in this case on the basis of federal question pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1692k(d). [ECF No. 1, p. 2, ¶ 2].

2. The full name of this Defendant is Healthcare Revenue Recovery Group, LLC (“HRRG”), who does business in Oklahoma as ARS

Account Resolution Services.

3. HCFS Health Care Financial Services, LLC ("HCFS") is the sole member of HRRG.
4. Neither HRRG nor HCFS is a publicly held corporation.
5. Neither HRRG nor HCFS is a governmental entity.

Dated: September 23, 2021. Respectfully submitted,

/s/ Kevin T. Crocker

Kevin T. Crocker, Esq.
Texas Bar No. 05087250

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ATTORNEYS FOR DEFENDANT
HEALTHCARE REVENUE RECOVERY
GROUP, LLC d/b/a ARS ACCOUNT
RESOLUTION SERVICES

CERTIFICATE OF SERVICE

This is to certify that on the 23rd day of September 2021, a true and correct copy of the above and foregoing "*Defendant's Disclosure Statement Identifying Constituents of LLC or Partnership*" was served *via the Court's CM/ECF system and/or by e-mail transmission* on counsel for Plaintiff, Nkem A. House, Esq., House Law Group, 527 N.W. 23rd Street, Suite 200, Oklahoma City, Oklahoma 73072, (405) 602-5393 [Telephone], e-mail: houselawfirm@gmail.com.

/s/ Kevin T. Crocker

Kevin T. Crocker, Esq.